

IRVING COHEN  
ATTORNEY AT LAW

(212) 964-2544  
FAX (212) 406-2313  
ICOHENLAW@MSN.COM

233 BROADWAY  
SUITE 1800  
NEW YORK, N.Y. 10279

January 20, 2016

Hon. Andrew L. Carter  
United States District Court  
Southern District of New York  
40 Centre Street  
New York, New York 10007

**Re: U.S.A. v. Chandrica Clarke,  
15 Cr. 844 (ALC)**

Dear Judge Carter:

I am the attorney for the defendant, Chandrica Clarke, having been duly appointed pursuant to the Criminal Justice Act. This letter is respectfully submitted to obtain Your Honor's approval to allow me to use the services of an associate pursuant to CJA 18 U.S.C. 3006(e)(1).

In more than six cases over the last year-and-a-half, judges in this District have approved the appointment of Saraswati Tomar to assist me in cases in which there was a voluminous amount of discovery. One case, which proceeded to a two month trial, was a "RICO" prosecution in which my client was originally facing death eligible charges. As with that case and the others to which Ms. Tomar was appointed, this case presents me with the need for assistance. According to the Government – and to what I have already received – the discovery in this case contains thousands of pages of material. This includes business records of several kinds, physical evidence, surveillance videos, search warrants and their results and the like.

Ms. Tomar had worked at the United States Attorney's Office for the Eastern District of New York. She was highly recommended to me by an Assistant in that Office who had previously clerked for Judge Loretta A. Preska in this District. Ms. Tomar's billing rate has been \$ 90.00 per hour. Ms. Clarke has been adjudged unable to pay for legal services and costs. I am highly conscious of needlessly expending CJA funds. In this case, I believe the appointment of an associate will result in a saving by relieving me of tasks that would be billed at a higher rate.

In addition, at this particular time, the appointment of Ms. Tomar would be instrumental in having this case move forward expeditiously. As I indicated at the conference, I will be away from New York for the better part of February. With Ms. Tomar assisting me, there will be no delay in reviewing discovery – both without and with Ms. Clarke at the Metropolitan Correctional Center.

IRVING COHEN  
ATTORNEY AT LAW

I ask Your Honor to approve the appointment of Ms. Tomar by indorsing this letter accordingly, or, if you prefer, I can prepare an order for your signature.

Thank you for your consideration of this request.

Very truly yours,

IRVING COHEN

2015 U.S. District Court, W.D. Pa., Case No. 1:15-cr-00844-ALC

1000 Spring Garden Street, Philadelphia, Pennsylvania 19104-3305

Telephone: (215) 546-3300; Facsimile: (215) 546-3301

E-mail: [irvingcohen@msn.com](mailto:irvingcohen@msn.com)

Attorneys for Plaintiff, Commonwealth of Pennsylvania

and Plaintiff, Commonwealth of Pennsylvania, et al.

Irving Cohen  
Attorney at Law

Very truly yours,

IRVING COHEN

2015 U.S. District Court, W.D. Pa., Case No. 1:15-cr-00844-ALC

1000 Spring Garden Street, Philadelphia, Pennsylvania 19104-3305

Telephone: (215) 546-3300; Facsimile: (215) 546-3301

E-mail: [irvingcohen@msn.com](mailto:irvingcohen@msn.com)

Attorneys for Plaintiff, Commonwealth of Pennsylvania

and Plaintiff, Commonwealth of Pennsylvania, et al.

Irving Cohen  
Attorney at Law